

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ROBERT P. MAHER and MARILYN V.)	
MAHER, individuals,)	
)	Case No. 12-cv-07169
Plaintiffs,)	
)	Honorable Marvin E. Aspen
v.)	
)	Magistrate Judge Arlander Keys
THE ROWEN GROUP, INC., d/b/a)	
PLAYROOM ENTERTAINMENT, a)	
California corporation; and DANIEL M. J.)	
ROWEN, an individual,)	
)	
Defendants.)	

MOTION FOR ENTRY OF JUDGMENT ON COURT’S ORDER DATED MAY 12, 2014

Robert P. Maher and Marilyn V. Maher (“Plaintiffs”), by their attorneys, Leonard S. Shifflett and Christopher J. Zdarsky, request that this Court direct the Clerk of the Court pursuant to FED. R. CIV. P. 58(b)(2)(B) to enter judgment in favor of Plaintiffs and against The Rowen Group, Inc. d/b/a Playroom Entertainment (“Playroom”) and Daniel M. J. Rowen (“Rowen,” along with Playroom, the “Defendants”), jointly and severally, in the amount of \$22,049.60. In support of their Motion, Plaintiffs state as follows:

1. In this Court’s order entered on July 30, 2013, this Court awarded to Plaintiffs their attorneys’ fees and costs incurred in bringing their motion to compel Defendants to attend a FED. R. CIV. P. 30(b)(6) deposition, the costs incurred by Plaintiffs in deposing Rowen, and the cost that would be incurred in the re-deposition of Rowen. [Doc. #124].

2. Further, in this Court’s order entered on May 12, 2014, this Court granted Plaintiffs’ motion concerning fees and costs incurred in connection with the taking and re-taking of Defendants’ 30(b)(6) deposition [Doc. # 194], and awarded to Plaintiffs their attorneys’ fees and costs in the amount of \$22,049.60. [Doc. # 215].

3. Specifically, the Court stated that it “will allow plaintiffs to recoup attorneys’ fees in the amount of \$19,627.50 and costs in the amount of \$2,422.10, for a total of \$22,049.60. This is the amount of the sanction to be paid to the plaintiffs in connection with the taking and re-taking of defendants’ Rule 30(b)(6) deposition and the motions necessitated thereby.” *Id.*

4. Since the entry of the Court’s order of May 12, 2014, Plaintiffs have received no payment from Defendants on the sum awarded by the Court nor have Defendants stated when they will make payment.

5. A form of judgment is attached hereto as Exhibit A.

WHEREFORE, Robert P. Maher and Marilyn V. Maher request that this Court direct the Clerk of the Court pursuant to FED. R. CIV. P. 58(b)(2)(B) to enter judgment in this action in favor of Plaintiffs, Robert P. Maher and Marilyn V. Maher, and against Defendants, The Rowen Group, Inc., d/b/a Playroom Entertainment and Daniel M. J. Rowen, jointly and severally, in the amount of twenty two thousand, forty nine and 60/100 dollars (\$22,049.60) as set forth in the form approved by the Court, attached hereto as Exhibit A, and for such other and further relief as this Court deems just.

Dated: May 15, 2014

Respectfully submitted,

ROBERT P. MAHER and MARILYN V.
MAHER, individuals

By: /s/ Leonard S. Shifflett
One of Their Attorneys

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